

Amateur Radio Station: KW1I
9 Dean Avenue
Bow, New Hampshire 03304
November 25, 1998

Federal Communications Commission
Washington, DC

In the matter of WT Docket 98-143:

Please see my comments on various sections of the NPRM.

License Simplification

I am concerned about the proposed phase out of the Novice class license. Since I favor substantial CW requirements for HF licenses, I believe it is necessary to have a lower CW speed entry license for CW HF privileges.

Novice Band Segments

I do not think it is necessary to have Novice frequency segments, even with an entry-level CW license. The present Novice bands could be used to expand adjacent segments.

Volunteer Examiners

I am a Volunteer Examiner. I suggest that Volunteer Examiners be taken from the highest license class only, so that the privilege of being a VE is part of the incentive to work for the highest license. Expanding to lower license classes puts a burden on VE organizations to match up the VE with test takers during the examination sessions. This is not a move toward simplification. It can lead to complexity in administering the tests and increased possibility for error.

Privatization of Enforcement

Lawless behavior on the amateur bands is at an unprecedented level. I believe it has discouraged many amateurs and parents from involving very young people into the hobby. I encourage the Commission to concentrate their attention on this subject. One possibility would be for the FCC to select amateurs, who meet stringent qualifications, to be training to exercise special enforcement authority, over and above, what is currently provided for by the Amateur Auxiliary. The FCC might create a special certification for amateurs who become proficient in radio direction finding. These amateurs would be able to provide FCC enforcement personnel with trustworthy location information to augment the Commission's own locating resources. When the FCC sanctioned amateur RDF

program became better known, many potential illegal operators would think twice before they made illegal broadcasts and created malicious interference. A certified amateur RDF program would remove the cloak of anonymity from these illegal operators.

Telegraphy Examination Requirements

I believe that substantial CW requirements should be part of our licensing system. I believe that our current levels of 5, 13 and 20 wpm are adequate for future requirements. I do not believe that CW is an obsolete mode, but I do realize that with the current state of technology, deploying CW commercial and military communication systems is no longer cost effective. Since one of Amateur Radio's most important purposes is to provide emergency back up communications, I believe CW still has an important role to play.

Historically, CW has been an important emergency communications mode. In the future, CW, by its very definition, will always be the backup emergency communications mode of last resort because when all else fails, any transmitter can be keyed off and on to pass a Morse message. The fact that the civil and military use of CW has been largely discontinued does not change this fact. CW emergency messages will be tapped out on makeshift or partially disabled transmitters long after CW is removed from the mode switch of military radio equipment. CW use has been discontinued in these and other services because with more modern communication systems and solid state reliability, its use is no longer cost effective. But, cost is not a factor for Amateur Radio provided emergency communications. The fact is, these communications are free to society. The availability of CW, the ultimate backup mode in emergency communications, is also free. Amateur radio licenses should require CW testing to insure this important emergency backup capability continues to be available to society.

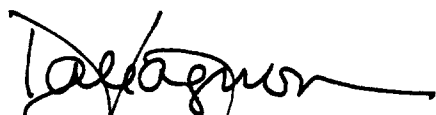
CW proficiency is also key to high operating standards. Disciplined behavior and high operating standards are important to the Amateur Service, especially when it is called on to perform emergency communications. How can future amateur radio license testing insure that operators have an acceptable minimum level of operating discipline? Probably the best way is the method we have now, to include CW as a testing requirement for select amateur radio license classes. Learning the code, its abbreviations and conventions and formal and informal message protocol, instills disciplined messaging skills in amateur radio operators. Transmitting CW requires an operator to form letters and words clearly to insure they are understood by receiving stations. Proficiency in receiving CW depends on developing automatic responses to letters, words, phrases and Q signals and to learn to do this without distraction under high levels of stress and in QRM and QRN. The amateur operator disciplines and operating standards acquired by developing proficiency in CW are transferable to operations in any mode. High

operating standards will also have a positive effect on the general civility of regular amateur radio activity.

All the code tests that I have taken required one minute of solid copy. I favor this method.

I do not favor the use of more complex written tests as a substitute for demonstration of code proficiency.

Thank you for the opportunity to submit these comments.



Dale Gagnon, KW1I